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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT FOR THE
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

| | | |
|-------------------------------|---|---------------------------|
| HARD DRIVE PRODUCTIONS, INC., |) | No. C-11-01566 JCS |
| |) | |
| Plaintiff, |) | RULE 26(f) REPORT |
| v. |) | |
| |) | |
| DOE DEFENDANT ASSOCIATED WITH |) | |
| IP ADDRESS 173.55.54.77, |) | |
| Defendant. |) | |
| |) | |

RULE 26(f) REPORT

Plaintiff Hard Drive Productions, Inc., by and through its counsel, hereby submits this Rule 26(f) Report pursuant to the Court's Order Setting Initial Case Management Conference and ADR Deadlines (Doc. No. 3), Federal Rules of Civil Procedure (hereinafter "FRCP") Rules 26(a)(1) and 26(f), and Northern District of California Civil Local Rule (hereinafter "L.R.") 16-9(a):

1. Individuals Likely to Have Discoverable Information:

- Paul Pilcher, CEO of Hard Drive Productions, Inc.
- Peter Hansmeier – 161 North Clark Street, Suite 3200, Chicago, Ill., 60601.
- Person Most Knowledgeable ("PMK") at each Internet Service Provider, Verizon Wireless – Legal Department Compliance Contact Information.

- Subscriber/Doe Defendant
- Plaintiff reserves the right to add to this list of individuals identified as necessary in the future.

2. Documents, Electronically Stored Information, and Tangible Things:

- Physical Documents – Plaintiff’s copyright records.
- Electronically Stored Information – BitTorrent auditor, forensic information demonstrating infringing activity over the BitTorrent.

3. Projected Discovery Timelines:

At this point, any projected timelines are premature for reasons explained in Plaintiff’s Case Management Conference Statement. (*See* ECF No. 29).

4. Subjects on Which Discovery, Including Electronic Discovery, Will be Needed:

Plaintiff notes that this aspect is thoroughly flushed out in Plaintiff’s Initial Case Management Conference Statement. (*See* ECF No. 29.)

5. Objections:

Plaintiff objects to the Court requiring Plaintiff to make any projected deadlines in this case at this time.

6. Discovery Motion Currently Pending:

N/A.

7. Other Issues:

N/A.

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1 Respectfully Submitted,

2 STEELE HANSMEIER PLLC,

3 **DATED: November 11, 2011**

4 By: /s/ Brett L. Gibbs, Esq.

5 Brett L. Gibbs, Esq. (SBN 251000)
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10 *Attorney for Plaintiff*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 11, 2011, all individuals of record who are deemed to have consented to electronic service are being served a true and correct copy of the foregoing document, and all attachments and related documents, using the Court's ECF system, in compliance with Local Rule 5-6 and General Order 45.

/s/ Brett L. Gibbs
Brett L. Gibbs, Esq.